

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

ROBERT “BOB” ROSS,

**Plaintiff/Counterclaim
Defendant,**

V.

**ASSOCIATION OF PROFESSIONAL§
FLIGHT ATTENDANTS, *et al.*, §**

Defendants/Counterclaim Plaintiff.

§ 87(2)(b)

Civil Action No. 4:22-cv-343-Y
Judge Terry R. Means

PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Plaintiff Robert “Bob” Ross moves for summary judgment holding Defendants for breach of fiduciary duty, breach of , breach of union constitution, violations of his rights to free speech, association, due process, and wrongful discipline under 29 U.S.C. §§ 411 (a)(2), (a)(5), and 529, Intentional Interference with a Contract, and Defamation. The issues arises from a confidential transition agreement entered into by the APFA Board of Directors and Plaintiff, and Defendants’ allegations of a financial misuse of Plaintiff. The matters required by Local Rule 56.3(a) are set forth in the Plaintiff’s supporting brief, and an appendix containing the materials supporting this motion and brief is being filed separately.

Date: January 8, 2024

Respectfully submitted,

By: /s/ Kerri Phillips
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CERTIFICATE OF SERVICE

I certify that on January 8, 2024 a true and correct copy of the above was served on Defendants' attorneys, via the e-filing manager.

/S/ Kerri Phillips
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